

EXHIBIT 4

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(Proposed Confidentiality Agreement)

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

In re

THE ROMAN CATHOLIC ARCHBISHOP
OF SAN FRANCISCO,

Debtor and
Debtor in Possession.

Case No. 23-30564

Chapter 11

**CLAIMS CONFIDENTIALITY
AGREEMENT**

This Agreement (“Agreement”) is entered into as of _____.

The undersigned (the “Recipient”) is a Permitted Party pursuant to the Order Fixing Time for Filing Proofs of Claims; Approving Proof of Claim Forms; Providing Confidentiality Protocols; and Approving Form and Manner of Notice (the “Order”) [Docket No. ____] on _____, 2023 by the United States Bankruptcy Court for the Northern District of California (the “Court”) in Case No. 23-30564, In Re: The Roman Catholic Archbishop of San Francisco (the “Case”).

WHEREAS, the Recipient requests access to confidential Survivor Proof of Claim Forms¹ filed in the Case after execution of this Agreement pursuant to and in accordance with the terms of the Order;

WHEREAS, Recipient agrees to keep the information provided in any and all Survivor Proof of Claim Forms confidential pursuant to and in accordance with the terms of the Order and this Agreement; and

¹ Capitalized terms used but not defined herein shall have the meaning and definitions ascribed to them in the Order.

1 **WHEREAS**, with the exception of the parties identified in paragraph 15(d) of the Order,
2 access to the Survivor Proof of Claim Forms extends only to the natural person who executes this
3 Agreement. A separate confidentially agreement must be signed by each natural person who seeks
4 access to the Survivor Proof of Claim Forms on behalf of a Permitted Party.

5 **NOW, THEREFORE, IT IS AGREED AS FOLLOWS:**

6 1. Recipient agrees to keep the information provided in the Survivor Proof of
7 Claim Forms confidential pursuant to and in accordance with the terms of the Order;

8 2. Recipient agrees to not distribute any Survivor Proof of Claim Forms or
9 information provided in the Proof of Claim Forms in violation of the Confidentiality
10 Protocols in the Order.

11 3. Recipient agrees that only the natural person who executes this Agreement
12 will have access to the Survivor Proof of Claim Forms unless Recipient is a Permitted Party
13 pursuant to paragraph 15(d) of the Order.

14 4. Recipient will only communicate information from the confidential Survivor
15 Proof of Claim Forms with other Permitted Parties who have executed a confidentiality
16 agreement pursuant to the Order.

17 5. Recipient consents to the jurisdiction of the Court to adjudicate any violation
18 of this Agreement or the Order.

19 6. Recipient shall promptly report any disclosure of information from a
20 confidential Survivor Claim to the Debtor and any appointed Committee, and shall cooperate
21 with efforts to recover the information and/or mitigate the effects of the disclosure.

22
23 Dated: _____, 2023.

24 Signature: _____

25 Print Name: _____

26 Name of Party Represented (if any): _____